

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

BRAINCHILD SURGICAL DEVICES)	
)	
Plaintiff,)	
)	
vs.)	Case No. 1:21-cv-554 (RDA/LRV)
)	
CPA GLOBAL LIMITED, et al.,)	
)	
Defendants.)	

**PLAINTIFF’S EXPEDITED MOTION TO COMPEL PRODUCTION OF
DOCUMENTS**

Pursuant to Fed. R. Civ. P. 37 of the Federal Rules of Civil Procedure and Local Rules 26 and 37 of the Local Rules for the Eastern District of Virginia, Plaintiff Brainchild Surgical Devices, LLC (“Plaintiff”), by counsel, move this Court to compel Defendant CPA Global Limited (“CPA”) to respond to Plaintiff’s First Requests for Production of Documents (“Requests”). In addition, Plaintiff move the Court to order Defendant to pay the reasonable expenses, including attorney’s fees, related to the instant Motion to Compel. Plaintiffs seek an expedited hearing on the instant Motion in accordance with paragraph 12(e) of the Rule 16(b) Scheduling Order entered in this case. (Dkt. No. 35.) Pursuant to Local Rule 37(E), counsel for Plaintiff certifies that attempts to confer with Defendant were made in a good faith effort to decrease the necessity of the instant

motion and to potentially resolve the discovery issues in controversy without the need for further Court intervention.

WHEREFORE, for the reasons set forth more fully in the Memorandum of Law in Support of its Expedited Motion to Compel, Plaintiff respectfully requests that this Court grant the Motion to Compel and order that Defendant provide full and complete responses to its Requests for Production and award Plaintiffs' attorneys' fees and costs in filing this motion.

Respectfully submitted,

Dated: May 5, 2023

By: /s/ Geoffrey A. Neri

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of May, 2023, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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DATED: May 5, 2023

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